ATTACHMENT 5

INSPECTIONS

5.A. INSPECTION PROCEDURES

5.A.I. The inspections outlined in this Attachment are the minimum required. All inspections required by this permit shall be documented on forms and maintained as part of the facility operating record. Copies of the inspection forms are found in Appendix A-ATTACHMENT 5.

5.A.II. The Branch Manager or designee (the inspector) shall be responsible for carrying out and documenting the facility inspections each business day. The inspector shall note any identified ruptures, spills, or repairs that are needed and note remedy actions. If the inspector cannot carry out the repairs, the inspector shall work with an engineering project manager at Safety-Kleen's corporate headquarters to complete the repairs. Completion of repairs shall be noted on the Facility inspection record.

5.A.III. Facility inspections shall include the following:

5.A.III.a. Tank inspections -- Tanks holding the clean solvent and the tank holding the spent solvent shall be inspected at least once each business day. The inspections shall include checks of the high level alarm and of the volume of solvent held in the tank. Sudden deviations in the solvent volumes shall be immediately investigated and the cause determined. If necessary, repairs shall be initiated immediately. Pick-ups of spent solvent shall be scheduled on a regular basis. The spent solvent quantity shall not exceed the permitted tank volume at any time. The tanks are equipped with high-level audiovisual alarms and manual shut-off valves.

5.A.III.b. The secondary containment for the tanks shall be inspected each business day for cracks or other deterioration. Any damage to the tanks (such as rust or loose fixtures) or the secondary containment shall be noted and repairs initiated.

5.A.III.c. Air emission inspections shall be conducted on the waste tank and ancillary equipment and the solvent recycling system in accordance with Condition 5.B. of this attachment.

5.A.III.d. Air emission inspections shall be conducted on the containers and tank system in accordance with Condition 5.C. of this attachment.

5.A.III.e. Solvent dispensing equipment -- The solvent dispensing hose, connections and valves shall be inspected for damage (such as cracks or leaks) and proper functioning. Any solvent left in the hoses shall be drained after use. The pumps, pipes and fittings shall be checked for damage and proper functioning. Any damage to the solvent dispensing equipment shall be noted and repaired.

5.A.III.f. Container storage areas -- Container storage areas shall be inspected for the number and condition of the drums stored. The total volume of the materials held in the container storage areas shall not exceed 4,500 gallons for the warehouse container storage area and 3,300 gallons for the metal shelter container storage area. Any leaking or suspect drum shall be placed in a salvage drum of adequate integrity. Drums shall be inspected to determine if they are properly labeled and marked in accordance with U.S. DOT and R315 of the rules. The secondary containment system, condition of the pad and sumps shall be inspected for deterioration or failure. If cracks or leaks are detected, they shall be repaired immediately.

5.A.III.g. Route vehicles -- Each route vehicle shall be inspected to ensure the proper operation of its brakes, lights, turn signals, emergency flashers and wipers. In addition, the necessary safety equipment shall be inspected to determine if: sorbents, fire extinguisher, eye wash, first aid kit, reflector kits, rubber gloves, plastic aprons, and safety glasses are in the vehicle. Any missing equipment shall be replaced.

5.A.III.h. Dumpster/drum washers -- The dumpsters/drum washers at the return and fill station shall be inspected for leaks and sediment build-up. Any leaks shall be noted and repaired immediately and excess sediment shall be removed from the dumpster.

5.A.III.i. Safety equipment -- The fire extinguishers shall be checked weekly to ensure that the units are charged and accessible, and shall be inspected annually. The fire suppression system shall be checked weekly to ensure that the unit is charged and shall be inspected annually. In addition, proper operation of the eyewash shall be confirmed and the first aid kit and sorbents shall be inspected for adequate content and accessibility. The identity and location of the emergency equipment required at the facility is included in ATTACHMENT 3, Preparedness and Prevention.

5.A.III.j. Security -- The operation of each gate and lock shall be inspected. In addition, the fence and danger signs shall be inspected for deterioration on a weekly basis.

5.B. SUBPART BB INSPECTION PROCEDURES FOR TANK/DRUM WASHER SYSTEM/SOLVENT RECYCLE SYSTEM

5.B.I. These inspection procedures identify leaks from pumps, valves, flanges and other equipment associated with the return and fill station/drum washer, tank system and solvent recycle system and demonstrate compliance with the inspection requirements of R315-8-18. The organic liquid in these systems meets the definition of "in heavy liquid service" as defined in R315-8-18.

5.B.II. Pumps/Valves/Flanges/Other Equipment

5.B.II.a.i. Each pump, valve, flange and other equipment as defined in R315-8-18 (specifically 40 CFR 264.1051) shall be marked with a unique ID as indicated on

Drawings 7113-4200-301, Rev C and 7113-5600-350, Rev D in ATTACHMENT 7. Non-flanged fittings associated with the solvent still that are not required to be tagged, but are otherwise subject to Subpart BB, shall be painted brown. All piping under the return and fill dock is subject to Subpart BB except for the product piping that is painted green and orange.

5.B.II.a.ii. Each pump, valve, flange, and other equipment as defined in R315-8-18 that also meets the definition of being "in vacuum service" shall be marked with a unique ID as indicated on Drawing 7113-4200-301, Rev C. After labeling, these are exempt from additional regulation under R315-8-18 (specifically 40 CFR 264.1050(e)).

5.B.II.b. Each pump, valve, flange and other equipment regulated by Subpart BB shall be inspected each operational day for any evidence of leakage, which is indicated by any visual sign of liquids leaking/dripping from the equipment.

5.B.II.c. Evidence of leakage and means determined shall be noted on the inspection log.

5.B.II.d. When a leak is detected, it shall be repaired as soon as practical, but not later than 15 calendar days after being detected, except as provided in 40 CFR 264.1059.

5.B.II.e. Should a leak be detected, a first attempt at repair (e.g., tightening the packing gland) shall be made no later than five calendar days after the leak is detected.

5.B.II.f. Equipment discovered to be leaking shall be identified with a weatherproof tag containing the following information:

5.B.II.f.i. Equipment I.D number; and

5.B.II.f.ii. Date leak found.

5.B.II.g. A tag indicating a leak may be removed after effective repairs are made.

5.B.III. Results of Subpart BB inspections shall be recorded in the facility operating record on the Inspection Log Sheet for daily inspection of Tank/Solvent Still Equipment.

5.B.IV. Corrective action for each Subpart BB leak shall be recorded on the Inspection Log Sheet for daily inspection of Tank/Solvent Still Equipment.

5.C. SUBPART CC INSPECTION PROCEDURES FOR CONTAINERS AND TANK SYSTEM

5.C.I. The Permittee shall inspect containers subject to Level 1 controls and their covers and closure devices as follows:

5.C.I.a. In the case when a hazardous waste is already in the container at the time the Permittee first accepts possession of the container at the facility and the container is not emptied within 24 hours after the container is accepted at the facility, the Permittee shall visually inspect the container and its cover and closure devices to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. If a defect is detected, the Permittee shall make first attempts at repair no later than 24 hours after detection and the repair shall be completed as soon as possible, but not later than five calendar days after detection. If repair of a defect cannot be completed within five calendar days, then the hazardous waste shall be removed from the container and the container shall not be used to manage hazardous waste until the defect is repaired.

5.C.I.b. In the case when a container used for managing hazardous waste remains at the facility for a period of 1 year or more, the Permittee shall visually inspect the container and its cover and closure devices initially and thereafter, at least every 12 months, to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. If a defect is detected, the Permittee shall make first attempts at repair no later than 24 hours after detection and the repair shall be completed as soon as possible, but not later than five calendar days after detection. If repair of a defect cannot be completed within five calendar days, then the hazardous waste shall be removed from the container and the container shall not be used to manage hazardous waste until the defect is repaired.

5.C.II. The Permittee shall inspect containers subject to Level 2 controls and their covers and closure devices in accordance with R315-8-22 (specifically 40 CFR 264.1086(d)(4)).

5.C.III. The Permittee shall inspect the tank system air emission control equipment in accordance with the following requirements:

5.C.III.a. The fixed roof and its closure devices shall be visually inspected by the Permittee to check for defects that could result in air pollutant emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the roof and the tank wall; broken, cracked or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices.

5.C.III.b. The Permittee shall perform an inspection of the fixed roof and its closure devices at least once every year except as allowed below:

5.C.III.b.i. Following the initial inspection of the cover, subsequent inspection may be performed at intervals longer than one year under the following conditions:

5.C.III.b.i(A). In the case when inspecting the cover would expose a worker to dangerous, hazardous, or other unsafe conditions then the Permittee may designate a cover as an "unsafe to inspect cover" and comply with the following requirements:

5.C.III.b.i(A)1. Prepare a written explanation for the cover stating the reasons why the cover is unsafe to visually inspect, if required.

5.C.III.b.i(A)2. Develop and implement a written plan and schedule to inspect the cover as frequently as practicable during those times when a worker can safely access the cover.

5.C.III.c. In the event a defect in the fixed roof or its closure devices is detected, the Permittee shall repair the defect in accordance with the following schedule: The Permittee shall make first efforts at repair of the defect no later than five calendar days after detection, and the repair shall be completed as soon as possible but no later than 45 calendar days after detection unless the Permittee determines that repair of the defect requires emptying or temporary removal from service of the tank and no alternative tank capacity is available at the site to accept the hazardous waste normally managed in the tank. In this case, the Permittee shall repair the defect at the earliest available time when transfer of waste to the tank could be suspended and the tank emptied or removed from service. Repair of the defect shall be completed before the transfer of waste to the tank resumes.

APPENDIX A – ATTACHMENT 5

INSPECTION FORMS

Insert - Inspection Log Sheet for daily inspection of Storage Tank/Solvent Recycle Systems (4 pages)
- Inspection Log Sheet for daily inspection of Container Storage Area (1 page)
- Inspection Log Sheet for weekly inspection of Safety and Emergency Equipment, Security Devices and Miscellaneous Equipment (1 page)

INSPECTION LOG SHEET FOR:
DAILY INSPECTION OF STORAGE TANK / RECYCLE SYSTEMS
A separate log must be kept for each tank farm which contains a hazardous storage tank)

INSPECTOR'S NAME/TITLE:_____

	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
DATE (MM/DD/YYYY)					
Time:					
Inspectors Signature:					

STORAGE TANKS:

TANKS MUST NEVER BE MORE THAN 95% FULL	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
WASTE STORAGE TANK					
105 SOLVENT STORAGE TANK					
150 SOLVENT STROAGE TANK					

TANK EXTERIOR A N A N A N A N A N
If "N", circle appropriate problem: rust, or loose anchoring, lack of grounding, wet spots, discoloration, leaks, distortion, other: _____

High Level Alarms: A N A N A N A N A N
If "N", circle appropriate problem: malfunction "Power light", malfunctioning siren./strobe light, other: _____

Valves: A N A N A N A N A N
If "N", circle appropriate problem: leaks, sticking, other: _____

Volume Gauges: A N A N A N A N A N
If "N", circle appropriate problem: disconnected, sticking, condensation, other:_____

CONTAINMENT AREA (TANK Dike):

Bottom and Walls: A N A N A N A N A N
If "N", circle appropriate problem: cracks, debris in dike, open drums in dike, poding, wet spots, stains, sealant is pitted, cracked or shipped, deterioration, displacement, leaks, other: _____

Rigid Piping and Supports: A N A N A N A N A N
If "N", circle appropriate problem: distortion, corrosion, paint failure, leaks, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS:_____

An item not applicable, enter "N/A' after it and draw a line through the Acceptable/Not Acceptable row.

INSPECTION LOG SHEET FOR:
DAILY INSPECTION OF **STORAGE TANK / RECYCLE SYSTEMS**

INSPECTOR'S NAME/TITLE:_____

	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
DATE (MM/DD/YYYY					
Time:					
Inspectors Signature::					

TRANSFER PUMPS AND HOSES

Pump Seals: A N A N A N A N A N
If "N", circle appropriate problem: leaks, other: _____

Motors A N A N A N A N A N
If "N", circle appropriate problem: overheating, other:_____

Fittings: A N A N A N A N A N
If "N", circle appropriate problem: leaks, other:_____

Valves: A N A N A N A N A N
If "N", circle appropriate problem: leaks, sticking, other: _____

Hose Connections and Fittings: A N A N A N A N A N
If "N", circle appropriate problem: cracked, loose, leaks, other:_____

Hose Body: A N A N A N A N A N
If "N", circle appropriate problem: crushed, thin spots, leaks, other:_____

RETURN AND FILL STATION:

Wet Dumpster: A N A N A N A N A N
If "N", circle appropriate problem: excess sediment buildup, leaks, rust, split seams, distortion, deterioration, excess debris, other: _____

Secondary Containment: A N A N A N A N A N
If "N", circle appropriate problem: : cracks, ponding/wet spots, deterioration, other:_____

Loading/Unloading Area: A N A N A N A N A N
If "N", circle appropriate problem: sediment/liquid, leaks, deterioration, distortion, excess debris, other:_____

SOLVENT RECYCLE SYSTEM:

Solvent Separator: A N A N A N A N A N
If "N", circle appropriate problem: excess sediment buildup, leaks, rust, split seams, distortion, deterioration, other: _____

Still and ancillary equipment A N A N A N A N A N
If "N", circle appropriate problem: leaks, deterioration, distortion, other:_____

90 Day Still Residue Container: A N A N A N A N A N
If "N", circle appropriate problem: leaks, deterioration, distortion, not closed, other:_____

Secondary Containment:: A N A N A N A N A N
If "N", circle appropriate problem: debris, ponding/wet spots, deterioration, other:_____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS:_____

INSPECTION LOG SHEET FOR:
Daily inspection of **TANK / SOLVENT[1] STILL EQUIPMENT**

INSPECTOR'S NAME/ TITLE _____

INSPECTOR'S SIGNATURE:				
MONDAY	**TUESDAY**	**WEDNESDAY**	**THURSDAY**	**FRIDAY**

_____ /_____ /_____ _____ /_____ /_____ _____ /_____ /_____ _____ /_____ /_____ _____ /_____ /_____
DATE: (M/D/Y)

_____ _____ _____ _____ _____
TIME

Pump, Flange, or Valve number:

		Monday		Tuesday		Wednesday		Thursday		Friday	
1	1.5" Ball valve south drum washer	A	N	A	N	A	N	A	N	A	N
2	1.5" flange to electronic valve #3	A	N	A	N	A	N	A	N	A	N
3	Electronic valve	A	N	A	N	A	N	A	N	A	N
4	1.5" flange from electronic valve #3	A	N	A	N	A	N	A	N	A	N
5	1.5" flange to electronic valve #6	A	N	A	N	A	N	A	N	A	N
6	Electronic valve to CUP vat line	A	N	A	N	A	N	A	N	A	N
7	1.5" flange to electronic valve #6	A	N	A	N	A	N	A	N	A	N
8	Re-circulating pump south washer	A	N	A	N	A	N	A	N	A	N
9	1.5" ball valve south drum washer	A	N	A	N	A	N	A	N	A	N
10	2" Gate valve south drum washer	A	N	A	N	A	N	A	N	A	N
11	1.5" ball valve north drum washer	A	N	A	N	A	N	A	N	A	N
12	1.5" flange re-circulating pump #13	A	N	A	N	A	N	A	N	A	N
13	Recirculating pump north drum washer	A	N	A	N	A	N	A	N	A	N
14	1.5 " Ball valve north drum washer	A	N	A	N	A	N	A	N	A	N
15	2" Gate valve north drum washer	A	N	A	N	A	N	A	N	A	N
16	2" Ball valve auxiliary line	A	N	A	N	A	N	A	N	A	N
17	Basket strainer	A	N	A	N	A	N	A	N	A	N
18	Trash pump	A	N	A	N	A	N	A	N	A	N
19	2" Check Valve	A	N	A	N	A	N	A	N	A	N
20	2" Ball valve sump line	A	N	A	N	A	N	A	N	A	N
75	2" Check Valve sump line	A	N	A	N	A	N	A	N	A	N
21	3" Emergency valve waste tank	A	N	A	N	A	N	A	N	A	N
22	3" Gate valve waste tank	A	N	A	N	A	N	A	N	A	N
23	3" Emergency valve auxiliary line	A	N	A	N	A	N	A	N	A	N
24	3" Gate valve auxiliary line waste tank	A	N	A	N	A	N	A	N	A	N
33	Threaded Valve	A	N	A	N	A	N	A	N	A	N
76	3" Flange	A	N	A	N	A	N	A	N	A	N
28	Flanged Valve	A	N	A	N	A	N	A	N	A	N
77	3" Flange	A	N	A	N	A	N	A	N	A	N
25	3" Flange waste line	A	N	A	N	A	N	A	N	A	N
26	3" check valve	A	N	A	N	A	N	A	N	A	N
27	3" Gate valve tanker connection	A	N	A	N	A	N	A	N	A	N
74	20 inch Flange Waste Tank Manway	A	N	A	N	A	N	A	N	A	N
29	Threaded Valve	A	N	A	N	A	N	A	N	A	N
30	Dirty Solvent Pump to Recycle System	A	N	A	N	A	N	A	N	A	N
31	Threaded Valve	A	N	A	N	A	N	A	N	A	N
32	Threaded control valve	A	N	A	N	A	N	A	N	A	N
34	Threaded three way valve	A	N	A	N	A	N	A	N	A	N
35	Threaded Valve	A	N	A	N	A	N	A	N	A	N
36	Pump	A	N	A	N	A	N	A	N	A	N
37	Threaded Check Valve	A	N	A	N	A	N	A	N	A	N
38	Threaded Valve	A	N	A	N	A	N	A	N	A	N
39	Threaded Check Valve	A	N	A	N	A	N	A	N	A	N
40	Pump	A	N	A	N	A	N	A	N	A	N

If 'N', enter pump or valve # _____ and circle appropriate problem: potential leaks, active leak, sticking, wear, does not operate smoothly, other:
**A = acceptable N = not acceptable Draw a line through pump and valve I.D. numbers that do not apply

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS:_____

[1] The solvent in the tank and solvent still systems is heavy liquid.

INSPECTION LOG SHEET FOR:
Daily inspection of **TANK / SOLVENT STILL EQUIPMENT**

INSPECTOR'S NAME/ TITLE _____

INSPECTOR'S SIGNATURE:				
MONDAY	**TUESDAY**	**WEDNESDAY**	**THURSDAY**	**FRIDAY**

_____ /_____ /_____ _____ /_____ /_____ _____ /_____ /_____ _____ /_____ /_____ _____ /_____ /_____

DATE: (M/D/Y)

TIME

Pump, Flange, or Valve number:

		Monday		Tuesday		Wednesday		Thursday		Friday	
78	Threaded valve	A	N	A	N	A	N	A	N	A	N
41	Threaded valve	A	N	A	N	A	N	A	N	A	N
42	Threaded valve	A	N	A	N	A	N	A	N	A	N
79	Threaded solenoid actuated valve	A	N	A	N	A	N	A	N	A	N
43	Flange Preheat Heat Exchanger	A	N	A	N	A	N	A	N	A	N
44	Flange Preheat Heat Exchanger	A	N	A	N	A	N	A	N	A	N
45	Threaded solenoid actuated valve	A	N	A	N	A	N	A	N	A	N
46	Threaded valve (vacuum)	A	N	A	N	A	N	A	N	A	N
47	Threaded valve (vacuum)	A	N	A	N	A	N	A	N	A	N
48	Threaded solenoid actuated valve (vacuum)	A	N	A	N	A	N	A	N	A	N
49	Still Level Control vessel top flange (vacuum)	A	N	A	N	A	N	A	N	A	N
50	Solvent Inlet Flange to Condenser (vacuum)	A	N	A	N	A	N	A	N	A	N
51	Condenser Top Flange (vacuum)	A	N	A	N	A	N	A	N	A	N
52	Condenser Bottom Flange (vacuum)	A	N	A	N	A	N	A	N	A	N
53	Finish Condenser Bottom Flange (vacuum)	A	N	A	N	A	N	A	N	A	N
54	Finish Condenser Top Flange (vacuum)	A	N	A	N	A	N	A	N	A	N
55	Threaded check valve (vacuum)	A	N	A	N	A	N	A	N	A	N
56	Threaded solenoid actuated valve (vacuum)	A	N	A	N	A	N	A	N	A	N
57	Liquid Seal Vacuum Pump	A	N	A	N	A	N	A	N	A	N
58	Solvent/Water Separator flanged lid	A	N	A	N	A	N	A	N	A	N
59	Threaded valve	A	N	A	N	A	N	A	N	A	N
60	Threaded valve	A	N	A	N	A	N	A	N	A	N
61	Threaded valve	A	N	A	N	A	N	A	N	A	N
62	Tank Float Control Flange	A	N	A	N	A	N	A	N	A	N
63	Pump	A	N	A	N	A	N	A	N	A	N
64	Threaded solenoid actuated valve	A	N	A	N	A	N	A	N	A	N
65	Threaded valve	A	N	A	N	A	N	A	N	A	N
66	Salt Tower Bottom Inlet Flange	A	N	A	N	A	N	A	N	A	N
67	Salt Tower Bottom Drain Flange	A	N	A	N	A	N	A	N	A	N
68	Threaded Valve	A	N	A	N	A	N	A	N	A	N
69	Threaded Valve	A	N	A	N	A	N	A	N	A	N
70	Still Steam Coil Flange	A	N	A	N	A	N	A	N	A	N
71	Still bottoms drain valve, threaded & solenoid actuated	A	N	A	N	A	N	A	N	A	N
72	Still Bottoms pump	A	N	A	N	A	N	A	N	A	N
73	Threaded Valve	A	N	A	N	A	N	A	N	A	N
		A	N	A	N	A	N	A	N	A	N
		A	N	A	N	A	N	A	N	A	N
		A	N	A	N	A	N	A	N	A	N

If 'N', enter pump or valve # _____ and circle appropriate problem: potential leaks, active leak, sticking, wear, does not operate smoothly, other:
For all leaks and potential leaks, the leak Detection and Repair Record must be completed.
**A = acceptable N = not acceptable Draw a line through pump and valve I.D. numbers that do not apply

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS:_____